

WINDELS MARX LANE & MITTENDORF, LLP

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*Special Counsel for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

REALTY NEGOTIATORS DEFINED BENEFIT
PENSION PLAN; DAVID ABEL, individually,
and in his capacity as Trustee for REALTY
NEGOTIATORS DEFINED BENEFIT PENSION
PLAN,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05438 (SMB)

AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: January 22, 2016.
2. Fact Discovery shall be completed by: March 23, 2017.
3. The Disclosure of Case-in-Chief Experts shall be due: June 12, 2017.
4. The Disclosure of Rebuttal Experts shall be due: August 14, 2017.
5. The Deadline for Completion of Expert Discovery shall be: September 13, 2017.
6. The Deadline for Service of a Notice of Mediation Referral shall be: September 20, 2017.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: October 4, 2017.
8. The Deadline for Conclusion of Mediation shall be: February 1, 2018.

Dated: New York, New York
December 8, 2015

WINDELS MARX LANE & MITTENDORF,
LLP

By: /s/ Howard L. Simon

Howard L. Simon

Kim M. Longo

John J. Tepedino

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Trustee for the Substantively Consolidated
SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L.
Madoff*